

J-54170

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

DANIEL LOVELACE and
HELEN LOVELACE, Individually,
and as Parents of BRETT LOVELACE,
Deceased,

Plaintiffs,

VS.

NO. 2:13-cv-02289 dkv
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
BABU RAO PAIDIPALLI; and
MARK P. CLEMONS,

Defendants.

**DEFENDANT MARK P. CLEMONS, M.D.'S
DESIGNATION OF FRCP 26(a)(2)(B) SUPPLEMENTAL EXPERT WITNESSES AND
PHYSICIANS/MEDICAL PROVIDERS NOT EMPLOYED AS EXPERTS**

Defendant, Mark P. Clemons, M.D., by and through the undersigned counsel of record, pursuant to FRCP 26(a)(2)(B) files the following Supplemental Expert Witness and Treating Physicians/Medical Provider Disclosures who may be used at trial to present evidence under the aforesaid rule:

1. Defendant would adopt and incorporate by reference his prior FRCP 26(a)(2)(B) expert disclosures previously filed as if set forth verbatim herein.
2. Defendant, Dr. Mark P. Clemons, hereby cross-identifies all experts identified by co-defendants Dr. Babu Rao Paidipalli and Pediatric

Anesthesiologists, P.A., and incorporates by reference all opinions disclosed for those experts, including any subsequent deposition testimony, as if stated verbatim herein.

3. Defendant also reserves the right to supplement these disclosures in accordance with applicable Federal Rules of Civil Procedure as may be warranted by additional discovery or proof adduced in this cause, including, but not limited to, the opinions contained in the defense experts' discovery depositions.

This 13~~th~~ day of May, 2014.

LEWIS THOMASON

By: /s/ Marcy D. Magee

J. Kimbrough Johnson (No. 7953)
Marcy D. Magee (No. 19360)
Attorneys for Defendant,
Mark P. Clemons, M.D.
2900 One Commerce Square, 40 S. Main Street
Memphis, TN 38103
901-525-8721

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the following has been served on Mark Ledbetter, Attorney for Plaintiffs, Halliburton & Ledbetter, 254 Court Avenue, Suite 305, Memphis, TN 38103, and Jerry Potter, Bradley Gilmer and Karen Koplon, Attorneys for Defendants, Babu R. Paidipalli & Pediatric Anesthesiologists, P.A., Hardison Law Firm, 119 S. Main St., Suite 800, Memphis, TN 38103, via U.S. Mail, postage prepaid, this 13~~th~~ day of May, 2014.

/s/ Marcy D. Magee
Marcy D. Magee